

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

UNITED STATES OF AMERICA,)	CRIMINAL ACTION NO.
)	
Plaintiff,)	4:15-CR-00151-O-17
)	
v.)	
)	
CHRIS NICHOLSON,)	
)	
Defendant.)	
_____)	

DEFENDANT’S UNOPPOSED MOTION TO CONTINUE TRIAL

Defendant Chris Nicholson respectfully moves for a continuance of the trial setting in this case of six weeks. The Government does not oppose this requested continuance. In support, Mr. Nicholson would show as follows:

Mr. Nicholson first appeared with counsel at his initial appearance on December 3, 2015. The Court has set his case for trial on January 8, 2016, which is thirty-six days after the initial appearance and which includes the holidays.

This case involves 29 alleged co-conspirators and a tremendous amount of discovery, which defense counsel is just beginning to review. Counsel for the defendant has not yet been able to complete his investigation of the case. A continuance will enable counsel to provide effective assistance of counsel. Plea negotiations are ongoing. It is possible a continuance will enable the parties to resolve their issues without the necessity of trial, and it will allow counsel time to adequately prepare if there is a trial.

Additionally, defense counsel is set for trial on February 1, 2016, in this district in *United States v. Mecose Shorter*, No. 3:14-CR-078-N, in the United States District Court for the Northern District of Texas.

Therefore, defendant respectfully requests that the Court continue this case for six weeks, until Friday, **February 19, 2016**. This would be less than two weeks past the seventy-day speedy trial act limit. A proposed form of order has been mailed electronically to the Court pursuant to the Court's instructions.

Respectfully submitted,

/s/ John M. Helms
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Attorney for Defendant
Chris Nicholson

CERTIFICATE OF CONFERENCE

On December 8 and 11, 2015, I conferred by electronic mail with counsel for the United States, Shawn Smith, who stated that the United States does not oppose this motion.

/s/ John M. Helms
John M. Helms

CERTIFICATE OF SERVICE

I, John M. Helms, do hereby certify that, on this 11th day of December 2015, I caused the foregoing document to be served via electronic filing on all counsel of record via the Court's ECF system.

/s/ John M. Helms
John M. Helms